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**Draft Site-wide Environmental Impact Statement  
for Continued Operation of Lawrence Livermore  
National Laboratory and Supplemental Stockpile  
Stewardship and Management Programmatic  
Environmental Impact Statement  
U.S. Department of Energy  
National Nuclear Security Administration**



**Written Comment Form**  
*Must be received on or before May 27, 2004.*

*I attended the public hearing in Livermore on April 27, 2004. Due to the large number of people wishing to comment and the lateness of the hour when I left and had still not spoken, I am submitting these comments in writing only.*

*I wish to state my opposition to the research and development of nuclear weapons at the Livermore Lab which violates the obligations and agreements of international law - specifically the Treaty on the Non-Proliferation of Nuclear Weapons.*

*The increase of plutonium and development of portable nuclear weapons clearly represents vertical proliferation. The scientists & staff of Livermore Lab must discover how to disarm and safely dispose of the current arsenal of weapons. And additionally clean up the toxic chemicals that have entered the air, soil & water from their past work. Apparently this work should be sufficiently challenging as it has been unable to be successfully carried out to date.*

*Rebecca Moeller  
Santa Cruz, CA*

Comment forms may be mailed to:  
Mr. Tom Grim  
Document Manager  
National Nuclear Security Administration  
Livermore Site Office, L-293  
7000 East Avenue  
Livermore, CA 94550-9234

Comment forms may be faxed to:  
Mr. Tom Grim  
(925) 422-1776

Please use other side if more space is needed.

-----Original Message-----

**From:** Donald W. Moon [mailto:dw\_moon@comcast.net]  
**Sent:** Sunday, April 25, 2004 10:05 PM  
**To:** tom.grim@oak.doe.gov  
**Subject:** livermore publications re: the Lab.

Dear Mr. Grim:

I am troubled by statements in local publications about operations at LLNL. I retired from the lab about 10 years ago. I have tried to contact one of the "letters to the editors" regarding Tritium and found that the stated telephone number was for the "Holiday Inn Express--Tracey". Next, I am trying to contact you. I also suspect that the information is bogus.

If you receive this email--I refer you a Newspaper "The Independent" April 22, 2004 editorial page 4. It includes a "Mail Box" letter from Mary Perner, Livermore. She has NO listed phone number in Livermore.

The entry is nothing but a scare tactic--stating half-truths and claims of scientific truths-- which have nothing to do with reality.

I would like to know that you are aware of this trash. I would like to receive an email "Got it, Working on it" from you. The editors of "The Independent--Mailbox" should be put on notice. How can LLNL do its job in such an hostile environment?

Regards, Donald W. Moon

NO COMMENTS IDENTIFIED IN THIS SUBMITTAL

Moore, Charles V.  
Page 1 of 1

-----Original Message-----

**From:** moore [mailto:cvmoore@fea.net]  
**Sent:** Tuesday, April 27, 2004 12:04 PM  
**To:** tom.grim@oak.doe.gov  
**Cc:** Nancy Steinbock  
**Subject:** Proposed EIR for next 10 years

1/04.01 | This nation should be decreasing it's Weapons of Mass Destruction Programs, not increasing them. What are they going to be used for?.

The plan looks like an attempt to maintain and enlarge a bureaucracy that should be decreasing its activities.

Charles V. Moore, Laguna Woods, CA

Moore, Patricia  
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April 23, 2004

01055

RECEIVED MAY 26 2004

Mr. Tom Grim, Documents Manager  
DOE, NNSA, L-293  
7000 East Avenue  
Livermore, CA 94550

Dear Mr. Grim-

My name is Patricia Moore and I am a resident of Livermore, CA and a member of Tri-Valley CARES. I am a medical social worker and worked for 8 years in outpatient Hospice organizations. I have worked as a counselor with many 100's of dying patients and their families. My concern today is with environmental toxicity, specifically radioactivity, and its' impact on human health. As a health care worker, I have witnessed the ravages of terminal illness on children, teens and young adults, and have had to question why so many people are suffering and dying prematurely. Many times my patients suspected that they had developed their disease due to toxic exposure (Agent Orange, agricultural pesticides, chemicals, radiation) but they were not able to prove their cases.

1/04.01 | Given the overwhelming evidence of the health hazards of radioactive substances, I am shocked by Livermore Lab's 10 year plan to increase the administrative limit of plutonium by more than 100%, to revive the plutonium vaporization project, to manufacture tritium targets, and to increase by ten-fold the lab's day-to-day work with tritium.

2/25.05 | It is known that a person inhaling a few micrograms of plutonium, a microscopic amount, is likely to develop a fatal lung cancer 10 to 20 years after exposure. At some point, the cells damaged by alpha radiation begin to multiply uncontrollably. If we were subject to an earthquake or a terrorist attack or a local transport accident or a theft or a mistake on the part of a worker, the extremely combustible plutonium (which is also subject to spontaneous combustion) could burn and would produce tiny aerosol particles of plutonium, of respirable size, which can easily enter and lodge in the lungs. Livermore is a city and an area of enormous population growth, with many housing developments springing up all around the Lab. This is also a thriving agricultural region of grapes and cattle and olives and wine. How can the DOE and the Lab even consider ramping up programs with known carcinogens that can never be disposed of and that have a half-life of 24,000 years? The Integrated Technology Project states that there will be "a greater amount of material use, storage and transportation" of plutonium, right here near a population center of 7 million people.

3/23.02 | Tritium is much more radioactive than weapons-grade plutonium, and apparently the gas can escape easily during routine operations, or if there were an accident scenario. When released into the environment, it binds to water molecules and becomes biologically

Moore, Patricia  
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3/23.02  
cont.

toxic.<sup>1</sup> Tritiated water (HTO) is a common chemical state of tritium and according to the National Academy of Science it has easy and rapid access to living cells, including those of the embryo or fetus. According to the NAS study of low-level ionizing radiation, tritiated water induced significant decreases in relative weights of the brain, testes and ovaries when exposure (estimated at 3 rads per day) began at the time of the mother's conception. Even lower exposures (0.0003 rads per day and 0.03 rads per day) were implicated in the induction of behavioral damage, such as delayed development of the righting reflex (balance) and depressed spontaneous activity.<sup>2</sup>

4/16.01

There is also evidence that the low level radiation from tritium can interfere with the human master-code mechanism for DNA. And so far, there is no indication that this master-code mechanism has an ability to repair itself when damaged by tritium.<sup>3</sup> Further, it has been shown that tritium interferes with cell membrane systems. The lab already had two large accidental releases during the Cold War and there is evidence, even in your reports, that there are higher-than-normal levels of tritium in local grapes and wine.<sup>4</sup> It is illogical to assure us of our safety given the history of the Labs' spills, releases and leaks. Accidents will always happen.

5/23.01,  
23.02

I believe that manmade radioactive (as well as chemical and biological) pollutants in the environment must be minimized to ensure a healthy future for the earth's inhabitants. Research shows that cancer is only the tip of the iceberg for the genetic damage done by ionizing radiation. It is well known that radiation is a co-factor in many diseases, especially those diseases which are induced by free radical damage.<sup>5</sup> Radiation exposure also accelerates the aging process. According to the late John Goffman, no "safe level" of radiation exposure exists, although the EPA and NRC have set up "working" measurable standards. The Lab is already a Superfund cleanup site (which the current U.S. Administration wants to downplay.), and there are currently 900-1000 pending health claims against the DOE from workers at Livermore Lab.

6/07.01

My work with hundreds of dying people and their families made me realize how short our lives are and how fragile and precious life is. Why are we here on earth and what is most important? There are great minds and talents in the scientific community. Let's turn the focus away from generating more toxic and radioactive pollution, away from unnecessary diseases and health problems, away from global nuclear proliferation and toward the resolution of the serious global problems that face us. Please consider revising

<sup>1</sup> *Health Physics*, Vol. 36, 283-7, Radiation Effects of Tritiated Seawater on Development of the Goose Barnacle, Pergamon Press Ltd., 1979

<sup>2</sup> *National Academy of Science*.

<sup>3</sup> *NewScientist*, DNA: 50 Years of the Double Helix, Philip Ball, March 2003

<sup>4</sup> LLNL Yearly Environmental Report

<sup>5</sup> *Free Radicals in Biology and Medicine*, B. Halliwell and J.M.C. Gutteridge, Oxford Press 3<sup>rd</sup> Edition

6/07.01  
cont. | the alternatives analysis to include conversion of Livermore Lab to civilian sciences and to the cleaning up of existing radioactive materials.

Sincerely,



Patricia A. Moore, MSW  
23 Diamond Drive  
Livermore, CA 94550

Cc: Senator Diane Feinstein, Senator Barbara Boxer and Representative Ellen Tauscher

Mueller, Lynn  
Page 1 of 1

-----Original Message-----

From: Lynn Mueller [mailto:ismueller@yahoo.com]

Sent: Sunday, May 30, 2004 7:44 PM

To: Mr. Tom Grim

Subject: Proposals at Livermore Lab

Lynn Mueller  
1173 Sutter Street  
Berkeley, CA 94707

May 30, 2004

Mr. Tom Grim  
DOE, NNSA L-293  
7000 East Ave.  
Livermore, CA 94550

Dear Mr. Grim:

1/02.01

I write to you because the DOE has prepared a draft Site Wide Environmental Impact Statement (SWEIS) that proposes to ramp up nuclear weapons activities at the Livermore Lab in Northern California. Livermore Lab is working on the design of a new, high-yield nuclear bunker-buster, called the "Robust Nuclear Earth Penetrator," and I oppose its development. Additionally, I oppose the development of so-called "mini-nukes" and other new nuclear weapons concepts being researched at Livermore Lab.

2/04.01

I believe the DOE plan to introduce new weapons programs into LLNL will promote a new arms race and escalate the nuclear danger. Further, the DOE proposal to double LLNL's plutonium storage limit to 3,300 pounds and triple the amount held "at risk" in any one room increases the environmental threat LLNL poses to the people of California. The SWEIS propels Livermore Lab in exactly the wrong direction.

3/07.01

Instead of proposing new weapons projects, DOE should enhance the peaceful, civilian scientific capabilities and mission at Livermore Lab by proposing new, unclassified programs in environmental cleanup, non-polluting and renewable energy, earth sciences, astrophysics, atmospheric physics and others. The alternative of a "green lab" in Livermore should be pursued instead of the dangerous nuclear weapons future proposed by the Site Wide Environmental Impact Statement.

Thank you for considering my comments.

Sincerely,

Lynn Mueller

Multiple Signatory Letter 1  
Page 1 of 1

Fremont, California  
May 7, 2004

Mr. Tom Grim  
Document Manager,  
NNSA Livermore Site Office, L-293  
7000 East Ave.  
Livermore, California 94550-9234

Dear Mr. Grim,

1/04.01

The recently-released Site-Wide Environmental Impact Statement (SWEIS) for the Lawrence Livermore National Laboratory lays out plans for huge increases in nuclear Weapons design and manufacture in Livermore over the next ten years which we, the undersigned, feel are alarming.

A doubling of the amount of highly-toxic plutonium on-site, and a tripling of the amount allowed "at-risk" at one time. A ten-fold increase in allowable tritium "at-risk". Dangerous new experiments with plutonium vapor clouds, and small-scale fission in the NIF mega-laser. All of this, sandwiched between two earthquake faults, less than 40 miles from seven million people in the Bay Area.

2/03.01

To say we are disappointed with these plans for further development of nuclear weapons here in our area is putting it far too mildly. We feel that the failure of the recent war in Iraq is plentiful evidence that war, no matter how highly sophisticated the weapons developed, is not a reasonable solution to the social and political conflicts in the world. And to pour millions of dollars into the further development of such weapons does absolutely nothing to secure the safety of our nation or the stability of the nations of the world.

3/25.01

Secondly, the danger that such nuclear weapons design and manufacture brings to us in a very densely populated region threatened constantly by the possibility of earthquakes seems to us to be most irresponsible.

1/04.01

We strongly oppose these plans and urge you to take into consideration the feelings and concerns of the people of the Livermore and greater Bay area in your determinations.

cont.

Thank you. Sincerely,

Ellen M. Cunningham

Mary Jo Conant

Catherine D. Rielly

Dieter Jean Matthias Smith

Patricia M. Walsh

Ruth E. Newdick

Eleanor A. Kosulchik

Cecilia Soler

Caleb Marie Brown

Markus H. Corrigan

Lucille P. Siegel

Jody Jeanine Harrison

## Multiple Signatory Letter 2

### Page 1 of 3

-----Original Message-----

From: Tara Dorabji [mailto:tara@trivalleycares.org]

Sent: Wednesday, May 12, 2004 9:58 AM

To: Tom Grim

Cc: Bert Heffner

Subject: Request for DOE to give a 30 day extension on public comment on LLNL SWEIS

May 11, 2004

Mr. Tom Grim  
DOE, NNSA, L-293  
7000 East Avenue  
Livermore, CA 94550  
Tom.grim@oak.doe.gov\_

RE: Request for a 30 Day Extension for Public Comment on the Draft Site-Wide Environmental Impact Statement for Continued Operation of Lawrence Livermore National Laboratory and Supplemental Stockpile Stewardship and Management Programmatic Environmental Impact Statement (LLNL SW/SPEIS)

Dear Mr Grim:

1/31.02

The Public Hearings on the LLNL SW/SPEIS held in Livermore, Tracy and Washington DC on April 27, 28 and 30 were attended by at least 450 people. The hearings and the resulting media coverage were the first opportunity many people had to learn about the proposals. Many of these people and others have contacted Tri-Valley CAREs to receive copies of the LLNL SW/SPEIS and additional information in order to submit written comments. The outpouring of public response to this complex document clearly shows the need for an extension of the public comment period by thirty days.

The technical nature and length of the SW/SPEIS document makes it necessary for people to have more time to prepare written comments. On behalf of local, regional, national and international groups listed below, we request that the Dept. of Energy extend the public comment period by 30 days from May 27 to June 27.

2/31.06

In addition, Tri-Valley CAREs has requested, but not received, the reference documents used in the SW/SPEIS. The SW/SPEIS lacks critical information that explains the modeling that was used in the accident analysis. The background information requested is necessary to adequately evaluate the proposals in the SW/SPEIS document. We request again the source documents referenced in the SW/SPEIS.

We would appreciate hearing from you by May 18, 2004.

Sincerely,

Marylia Kelley  
Executive Director  
Tri-Valley CAREs

Jacqueline Cabasso  
Executive Director  
Western States Legal Foundation

## Multiple Signatory Letter 2

### Page 2 of 3

Robert M. Gould, MD  
President, SF-Bay Area Chapter, Physicians for Social Responsibility and Immediate Past-President,  
Physicians for Social Responsibility (National)

Diane D'Arrigo  
Director, Radioactive Waste Project  
Nuclear Information and Resource Service

Christopher Paine  
Senior Nuclear Program Analyst  
Natural Resources Defense Council

Ralph Hutchinson  
Coordinator  
The Oak Ridge Environmental Peace Alliance

Jeremy Maxand  
Executive Director  
Snake river alliance

Paul Leventhal  
Founder and President  
Nuclear Control Institute

Lorraine Krofchok  
Director  
Grandmothers for Peace International

Sandra Schwartz  
Peace education coordinator  
American Friends Service Committee

Pamela Silvola  
Co-Chair  
Committee to Minimize Toxic Waste

Tom Clements  
Nuclear Campaigner  
Greenpeace International

Peggy Maze Johnson  
Executive Director  
Citizen Alert

Tom Carpenter  
Executive Director  
Government Accountability Project

Jay Coghlan  
Executive Director  
Nuclear Watch of New Mexico

## Multiple Signatory Letter 2

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Jane Williams  
Executive Director  
California Communities Against Toxics

Louis Zeller  
Campaign Coordinator  
Blue Ridge Environmental Defense League

Robert K. Musil PhD MPH  
Executive Director and CEO  
Physicians for Social Responsibility

Joni Arends  
Executive Director  
Concerned Citizens for Nuclear Safety

Winnie Deitweiler  
Board Member  
Sacramento Area Peace Action; and

Joan B. Lee  
Legislative Liaison  
California Gray Panthers

CC: Bert Heffner, LLNL  
CC: Senator Feinstein  
CC: Senator Boxer  
CC: Representative Tauscher  
CC: Supervisor Haggerty

--  
Tara Dorabji  
Outreach Director  
Tri-Valley CAREs  
www.trivalleycares.org  
tara@trivalleycares.org  
ph: (925) 443-7148  
fax: (925) 443-0177

Before the word, was the silence. In this silence existed neither thought nor judgment

Attachment converted: Macintosh HD:Grim ltr request comment ex.doc (WDBN/MSWD) (0003D627)

## Multiple Signatory Letter 3

Page 1 of 1

Fremont, California  
May 7, 2004

Mr. Tom Grim  
Document Manager,  
NNSA Livermore Site Office, L-293  
7000 East Ave.  
Livermore, California 94550-9234

Dear Mr. Grim,

- 1/04.01 The recently-released Site-Wide Environmental Impact Statement (SWEIS) for the Lawrence Livermore National Laboratory lays out plans for huge increases in nuclear Weapons design and manufacture in Livermore over the next ten years which we, the undersigned, feel are alarming.
- 2/03.01 A doubling of the amount of highly-toxic plutonium on-site, and a tripling of the amount allowed "at-risk" at one time. A ten-fold increase in allowable tritium "at-risk". Dangerous new experiments with plutonium vapor clouds, and small-scale fission in the NIF mega-laser. All of this, sandwiched between two earthquake faults, less than 40 miles from seven million people in the Bay Area.
- 3/25.01 To say we are disappointed with these plans for further development of nuclear weapons here in our area is putting it far too mildly. We feel that the failure of the recent war in Iraq is plentiful evidence that war, no matter how highly sophisticated the weapons developed, is not a reasonable solution to the social and political conflicts in the world. And to pour millions of dollars into the further development of such weapons does absolutely nothing to secure the safety of our nation or the stability of the nations of the world.
- 1/04.01 Secondly, the danger that such nuclear weapons design and manufacture brings to us in a very densely populated region threatened constantly by the possibility of earthquakes seems to us to be most irresponsible.
- 1/04.01 We strongly oppose these plans and urge you to take into consideration the feelings and concerns of the people of the Livermore and greater Bay area in your determinations.
- cont.

Thank you. Sincerely,

*Cecilia Schaefer*  
*Mary Virginia Besch*  
*Kathleen McAvoy*